REMARKS/ARGUMENTS

Applicant respectfully requests reconsideration and allowance of the subject application.

Claims 1-47 were originally presented.

Claims 18 and 33 are canceled without prejudice.

No claims are added.

Claims 1 and 19 are currently amended.

Claims 1-17, 19-32, and 34-47 remain in this application.

35 U.S.C. §101

Claims 1-17 and 19-32 are rejected under 35 U.S.C. 101 "because the claimed invention is not supported by either a machine asserted utility or a well established utility. In particular, the claims are directed to non-statutory subject matter, specifically, as directed to an abstract idea". Independent claim 1 has been amended to recite "[A] method performed by a computer comprising ..." Since claim 1 has been amended to recite that a computer performs the method, claim 1 and dependent claims 2-17 are now supported by a machine or computer asserted utility. Independent claim 19 has similarly been amended. Therefore, claim 19 and its dependent claims 20-32 are now supported by a machine or computer asserted utility. Therefore, Applicant respectfully requests that the §101 rejection of claims 1-17 and 19-32 be withdrawn.

35 U.S.C. §102

Claims 1-11 and 14-18,19, 20-26, 30-33, 34, 35-39, 40, 41-42, 43-44, 45-47 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,367,621 to Cohen et al (Cohen). Applicant respectfully traverses the rejection.

Cohen teaches providing a generalized link to a multimedia object, where the link is used in referencing from a point in an organized hierarchy of an on-line softcopy text. The multimedia object may be represented by data which is also contained within the softcopy book or alternately which may be separate from the book as a separate file or a separate data base. This method taught by Cohen enables an author at the time of writing a softcopy book, to specify specific multimedia hardware and software support for the display of multimedia presentations accompanying the text in the book. (See Abstract of Cohen).

The method of Cohen begins by storing a formatted text stream in a data processing system. The formatted text stream includes a link description which contains multimedia type information, object location information and multimedia control information for a target multimedia object. The formatted text stream also includes a link tag associated with a link description, which identifies a source location in the formatted text stream from which a link is established to the target multimedia object. (Cohen, col. 2, lines 18-26).

The multimedia object is stored in a data processing system at a location identified by location information. The multimedia object includes multimedia data representing a multimedia presentation. A multimedia handler program in the data processing system, controls operations of a multimedia output device characterized by the multimedia type information. (Cohen, col. 2, lines 27-35).

Cohen further teaches displaying the formatted text stream in the data processing system. A link tag may be activated by the data processing system. The activation provides a transfer of the multimedia control information from the link description to the multimedia handler program. The multimedia handler program is executed by using the control information and in response thereto, transferring from the location identified by the location information to the multimedia output device, the multimedia data from the multimedia object. The method then produces the multimedia presentation with the multimedia output device using the multimedia data from the multimedia object. (Cohen, col. 2, lines 36-49).

Independent claim 1, for example, recites "[a] method performed by a computer comprising:

referencing one or more multimedia objects through a first set of one or more elements;

associating the first set of one or more elements with a second set of one or more elements; and

arranging the second set of one or more elements to indicate timing for the multimedia objects referenced by the first set of one or more elements.

Cohen fails to teach or disclose the method of claim 1. Claim 1 particularly recites the element "referencing one or more multimedia objects through a first set of one or more elements". The Action argues that "Cohen et al disclose(s) a method comprising 'referencing one or more multimedia objects through a first set of one or more elements' by providing a generalized link in a data processing system to enable referencing from a point within an organized hierarchy of an on-

line softcopy text to an arbitrary multimedia object". The Action cites the title; abstract; Col. 1, lines 63-66; and Col. 2, lines 13-16 of Cohen.

As discussed above, the Abstract of Cohen discloses a generalized link to a multimedia object. What is taught and disclosed in Cohen is a particular link to a particular multimedia object. What is recited in claim 1 is "one or more multimedia objects" that are referenced by a "first set of one or more elements". The first set of elements references the multimedia objects. In contrast, what is taught and disclosed by Cohen is a particular or generalized link to a particular multimedia object. There is no teaching or disclosure that the generalized link of Cohen includes a first set of one or more elements as recited in claim 1.

Claim 1 recites the element "associating the first set of one or more elements with a second set of one or more elements". The Action argues that "Cohen et al. disclose(s) the claimed limitations of 'associating the first set of one or more elements with a second set of one or more elements' by providing mechanisms that contains link description which contains multimedia type information, object location information, and multimedia control information for a target multimedia object". The Action cites Col. 2, lines 19-26; Figure 3a; and Col. 8, lines 27 of Cohen.

As discussed above, the formatted text stream includes the link description which contains multimedia type information, object location information, and multimedia control information for a target multimedia object. The formatted text stream also includes a link tag associated with the link description. The link tag is used to establish a link to the target multimedia object. The Action seems to argue that the generalized link teaches "the first set of one or more elements"; however, there is no teaching or disclosure in Cohen that associates the generalized link

with the multimedia type information, object location information, and multimedia control information, which the Action argues is a second set of one or more elements.

Claim 1 further recites "arranging the second set of one or more elements to indicate timing for the multimedia objects referenced by the first set of one or more elements". The Action argues that "arranging the second set of one or more elements to indicate timing for the multimedia objects referenced by the first set of one or more elements". The Action cites Figures 7a-7b; Col. 11, line 30 to Col. 14, line 20 of Cohen.

Figures 7a and 7b, the cited sections of Cohen, and Cohen in general, fail to teach or disclose timing, and in particular, timing for the multimedia objects. The Action argues that the multimedia type information, object location information, and multimedia control information are considered as "a second set of one or more elements"; however, there is no teaching or disclosure in Cohen as to "arranging" the multimedia type information, object location information, and/or multimedia control information "to indicate timing for the multimedia objects referenced by the first set of or more elements" as particularly recited in claim 1. The Action does not specifically address where in Cohen timing for multimedia objects is taught.

In view of the above, Cohen does not teach or disclose each and every element of claim 1. Thus, claim 1 is not anticipated by Cohen. Applicant respectfully requests that the §102 rejection of claim 1 be withdrawn.

Independent claims 19, 34, 40, 43, and 45 are rejected based on the same reasons as claim 1. Applicant presents the arguments in support of claims 19, 34, 40 43, and 45, as presented in claim 1 above. In view of the above, Cohen does

not teach or disclose each and every element as recited in claims 19, 34, 40 43, and 45. Thus, claims 19, 34, 40 43, and 45 are not anticipated by Cohen. Applicant respectfully requests that the §102 rejection of claims 19, 34, 40 43, and 45 be withdrawn.

Dependent claims 2-11 and 14-17 are allowable at least by virtue of their dependency on base claim 1. Applicant further provides additional arguments in support of particular dependent claims below. Applicant respectfully requests that the §102 rejection of claims 2-11 and 14-17 be withdrawn.

Claim 3 further recites "wherein the referencing and associating are performed by the same document". The Action cites Col. 2, line 10 – Col. 3, line 15 of Cohen as disclosing this element; however, this section of Cohen, and Cohen in general, fails to teach or disclose a document that both performs "referencing and associating". The Action does not specifically address where such a document is taught or disclosed in Cohen.

Claims 4-8 further recite elements directed to a "time container". The Action cites Figures 7a-7b; Col. 11, line 30 to Col. 14, line 20 of Cohen as disclosing a time container; however, as discussed above, this section, and Cohen in general, does not teach or disclose timing and/or a time container. The Action does not specifically address where in Cohen a time container is taught.

Claim 9 further recites "rendering of the multimedia objects based on the arranging of the second set of one or more elements". The Action does not address where in Cohen this element is taught or disclosed.

Claim 10 further recites "associating the second set of one or more elements with a third set of one or more elements". The Action cites Figures 6-8 and corresponding text of Cohen; however, this section of Cohen, and Cohen in

general, fails to teach or disclose this element, and the Action does not specifically address where in particular the element is disclosed in Cohen.

Claim 11 further recites "wherein the referencing is performed by a first document and the associating is performed by a second document". The Action cites Figures 6-8 and corresponding text of Cohen; however, this section of Cohen, and Cohen in general, fails to teach or disclose this element, and the Action does not specifically address where in particular the element is disclosed in Cohen.

Claim 14 further recites "receiving an input to initiate an event affecting an element in the first set of one or more elements and providing a proxy element in the second set of elements that is configured to reference application of the event". The Action cites Figures 4 and 5; Col. 8 line 61- Col. 10, line 11 of Cohen; however, this section and Cohen in general, fails to teach or disclose this element. In particular, Cohen fails to teach or disclose "providing a proxy element". The Action does not specifically address where in particular the additional element of claim 14 is disclosed in Cohen.

Claims 15 and 16 further recite elements directed to a "time container". The Action cites Figures 1-8 of Cohen as disclosing a time container; however, as discussed above, does not teach or disclose a time container. The Action does not specifically address where in Cohen a time container is taught.

Dependent claims 20-26 and 30-32 are allowable at least by virtue of their dependency on base claim 19. Furthermore, Applicant presents the arguments in support of particular claims that are rejected based on arguments in the Action as to claims 2-11 and 14-18 above. Applicant respectfully requests that the §102 rejection of claims 20-26 and 30-32 be withdrawn.

Dependent claims 35-39 are allowable at least by virtue of their dependency on base claim 34. Furthermore, Applicant presents the arguments in support of particular claims that are rejected based on arguments in the Action as to claims 2-11 and 14-18 above. Applicant respectfully requests that the §102 rejection of claims 35-39 be withdrawn.

Dependent claims 41 and 42 are allowable at least by virtue of their dependency on base claim 40. Furthermore, Applicant presents the arguments in support of particular claims that are rejected based on arguments in the Action as to claims 2-11 and 14-18 above. Applicant respectfully requests that the §102 rejection of claims 41 and 42 be withdrawn.

Dependent claim 44 is allowable at least by virtue of its dependency on base claim 43. Furthermore, Applicant presents the arguments in support of particular claims that are rejected based on arguments in the Action as to claims 2-11 and 14-18 above. Applicant respectfully requests that the §102 rejection of claim 44 be withdrawn.

Dependent claims 46 and 47 are allowable at least by virtue of their dependency on base claim 45. Furthermore, Applicant presents the arguments in support of particular claims that are rejected based on arguments in the Action as to claims 2-11 and 14-18 above. Applicant respectfully requests that the §102 rejection of claims 46 and 47 be withdrawn.

35 U.S.C. §103

Claims 12-13 and 27-29 are rejected under 35 U.S.C. 102(b) as being unpatentable over Cohen, in view of U.S. Patent Application No. 2004/0024898 to Wan (Wan). Applicant respectfully traverses the rejection.

The Action argues that "[a]s per claims 12-13 and 27-29, most of the limitations of these claims have been noted in the rejection of claims 1, 19, 34, 40, 43 and 45 above. Although Cohen et al. describes documents that are written in general markup language (GML) and style sheet; it is noted, however Cohen et al. did not specifically detail the aspects of documents that are written in XML as recited in the instant claims. On the other hand, Wan achieved the aforementioned claimed feature by providing a multimedia environment wherein multimedia documents are linked and written in XML (See Wan Title, Abstract; Pages 1-2, Paragraphs 0009-0024). It would have been obvious to one of ordinary skill in the art at the time of the invention to modify the data processing method of Cohen et al. by substituting the link tags written in SGML with link tags written in XML, the motivation being to provide a multimedia data processing method including documents written in XML".

Claims 12-13 depend from claim 1, and therefore include all the elements of claim 1. As discussed above, Cohen fails to teach each and every element of claim 1. Wan is cited for its teaching that the "multimedia documents are linked and written in XML"; however, Wan provides no assistance in light of Cohen as to the recited method of claims 12-13.

In view of the above, the combination of Cohen and Wan does not teach or suggest each and every element of claims 12-13. Thus, claims 12-13 are not obvious over the cited combination. Applicant respectfully requests that the §103 rejection of claims 12-13 be withdrawn.

Claims 27-29 depend from claim 19, and therefore include all the elements of claim 19. As discussed above, Cohen fails to teach each and every element of claim 19. Wan is cited for its teaching that the "multimedia documents are linked

and written in XML"; however, Wan provides no assistance in light of Cohen as to the recited method of claims 27-29.

In view of the above, the combination of Cohen and Wan does not teach or suggest each and every element of claims 27-29. Thus, claims 27-29 are not obvious over the cited combination. Applicant respectfully requests that the §103 rejection of claims 27-29 be withdrawn.

CONCLUSION

All pending claims 1-17, 19-32, and 34-47 are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the subject application. If any issues remain that prevent issuance of this application, the Examiner is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

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By: _____

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